

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA  
Ex rel: YOUNG: DENISE et al

Respondent

Vs.

MIDFIRST BANK, et al  
and

KML LAW GROUP, P.C. et al

Chapter 13

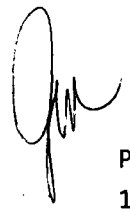
NO. 16-15780 ELF

**11 U.S.C. § 507**

**Priority Claim**

**EQUITABLE RELIEF**

SEP 15 2016



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**PLAINTIFF(s)/Movant(s)**

**Rule to Show Cause**

**AFFIDAVIT OF PRELIMINARY OBJECTIONS AND PRACEIPE TO  
SHOW CAUSE**

**BEFORE: ELF AND THIS HONORABLE COURT:**

**FACTS**

AND NOW, therefore upon this Affidavit YOUNG: DENISE aka Defendant(s) is the collateral interest and intangible asset belonging to the respondent aka the woman, Denise. Any action against the above subject remains in priority, with the American National, aka DENISE YOUNG

Plaintiff in this action does not have absolute title nor can it assert standing, if any, within, on or on behalf of the collateral interest and security of Respondent's **debtor** [property] aka DENISE YOUNG, rooted in the Commonwealth of Pennsylvania;

**NO. 16-15780 ELF**

Neither plaintiff nor its Court official has standing in the intangible asset rooted in DENISE YOUNG;

Plaintiff is not a **“creditor”** with priority claim to any “branches” of YOUNG;

Plaintiff is not **“kin”** with priority claim to any “branches” of the YOUNG estate;

Plaintiff's Agent, KML is a professional corporation without contract or agreement established on or for the YOUNG estate;

Counsel, is a professional corporation acting in the “stead” of another without consent or authority hailing from YOUNG;

Plaintiff has failed at all times, to state a claim, by which this Court of Equity can hear;

Plaintiff and its Agent shall remain harmless against the Commonwealth of Pennsylvania PAE \_ \_ \_ \_;

Plaintiff has failed at all times, to raise a claim, by its failure to substantiated any material proof of its legal or equitable **rights** to the chattel vested in YOUNG, filed with the Commonwealth of Pennsylvania;

Plaintiff is not immune from “Waiver of Tort”;

Respondent has rest on its legal and paramount Title against all inferior claims against the collateral security it holds interest in, aka YOUNG et al;

Respondent here, has valid verification by its OATH OF PURGATORY, in support of its collateral interest it possess as the intangible asset, YOUNG;

The Collateral, and Intangible Asset, aka DENISE YOUNG has never abuse any such acts under admiralty law, known as (THE CODE) 11 U.S.C 362; as natural law dictates this Trust;

Respondent has all necessary material evidence of [t]he abstract of Title superior to any defeasible title acquire through improper "acts" by the Plaintiff;

***In law**, Plaintiff must appear in proper person and provide evidence under penalty of perjury to substantiate a claim.*

Respondent demands that all objections under this Affidavit are answered under penalty of perjury; failure to do so, will vacate this action in its entirety;

**WHEREFORE**, Respondent moves for Show Cause Rule in its favor and request that the stay of relief remain and equitable relief, be Granted, as necessary.

FURTHER I AVER NOT

Respectfully Submitted

Date: 9/15

/s/: 

ALL LIBERTIES FIX

**SHOW CAUSE ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_ of the YEAR OF OUR LORD OF 2016 CE, upon consideration of (t)he foregoing petition, it is hereby ordered that:

- (1) A rule is issued upon (t)he Movant to show cause why the Respondent is not entitled to (t)he relief requested;
- (2) Movant shall file an answer to (t)he petition within 20 days of this date;
- (3) (T)he petition shall be decided under Pa.R.C.P. No. 206.7;
- (4) An evidentiary hearing on disputed issues of material fact shall be held within 14 days of this date October \_\_\_\_ 2016;
- (5) On October \_\_\_\_ of 2016, in Courtroom \_\_\_\_ of (t)he  
THE UNITED STATES BANKRUPTCY COURT; and
- (6) Notice of (t)he entry of this order shall be provided to all parties by  
(t)he Respondent;

BY THE COURT:

\_\_\_\_\_  
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